

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, JOHN  
MEINERS, and DANIEL UMPA, on behalf of  
themselves and all others similarly situated,  
Plaintiffs,

v.  
NATIONAL ASSOCIATION OF  
REALTORS, et al.  
Defendants.

Civil Action No. 4:23-cv-00788-SRB  
[Consolidated with 4:23-cv-00945-SRB]

**JURY TRIAL DEMANDED**

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION TO STAY CASE AS TO  
EXIT REALTY CORP. INTERNATIONAL AND EXIT REALTY CORP. USA**

Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (“Plaintiffs”) and EXIT Realty Corp. International and EXIT Realty Corp. USA (collectively, “EXIT Realty” and, together with Plaintiffs, the “Parties”) respectfully write to the Court to provide notice that the Parties have reached an agreement to settle all claims asserted against EXIT Realty in this action as part of a proposed nationwide class settlement. This agreement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, Plaintiffs will file a motion in this Court for preliminary approval of the proposed settlement.

As provided by the agreement, the Parties hereby jointly stipulate and request that the Court stay all deadlines and proceedings solely as to EXIT Realty to preserve the resources of Plaintiffs, EXIT Realty, and the Court, and to seek preliminary and final approval of the settlement.

Dated: April 8, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 2025, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Robert A. Braun  
ROBERT A. BRAUN